

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES	)	
	)	02 CR 200-22
v.	)	
	)	Judge Rebecca Pallmeyer
ANDRE LAWRENCE	)	

**MOTION FOR LEAVE TO FILE INSTANTER**  
**AMENDED MOTION FOR REDUCED SENTENCE UNDER**  
**SECTION 404 OF THE FIRST STEP ACT**

The defendant, ANDRE LAWRENCE, by the Federal Defender Program and its attorney, Amanda Penabad, respectfully requests that this Honorable Court grant him leave to file instanter an amended motion for a reduced sentence under Section 404 of the First Step Act, and also to formally appoint the Federal Defender Program to represent Mr. Lawrence in this matter.

1. The First Step Act was signed into law on December 21, 2018.
2. On January 7, 2019, Mr. Lawrence filed a pro se motion to reduce his sentence pursuant to the First Step Act. Doc. 1855.
3. This Court's General Order 19-0003, dated January 23, 2019, ordered that the Federal Defender Program for the Northern District of Illinois is appointed generally for all cases arising in this District under Section 404 of the Act where the defendant desires appointment of counsel and financially qualifies for such appointment.

4. Mr. Lawrence has communicated to undersigned counsel that he desires the Federal Defender Program to be appointed to represent him on his requested relief under the Act.

5. Mr. Lawrence is currently incarcerated in the BOP, so it appears that he also financially qualifies for the appointment of the Federal Defender Program.

6. Upon undersigned counsel's review of Mr. Lawrence's pro se filing, she believes that filing an amended motion would best represent Mr. Lawrence and also assist the Court in ruling on his requested relief. Therefore, the defense is now seeking leave to file an amended motion instant.

7. The government has no objection to the defense filing an amended motion instant.

WHEREFORE, based on the foregoing, Mr. Lawrence respectfully requests that this Court grant him leave to file instant an amended motion for a reduced sentence under Section 404 of the First Step Act, and also to formally appoint the Federal Defender Program to represent Mr. Lawrence in this matter.

Respectfully submitted,  
FEDERAL DEFENDER PROGRAM  
John Murphy,  
Executive Director

By: /s/ Amanda G. Penabad  
Amanda G. Penabad

AMANDA G. PENABAD  
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55 E. Monroe, Suite 2800  
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**CERTIFICATE OF SERVICE**

The undersigned, Amanda G. Penabad, an attorney with the Federal Defender Program hereby certifies that in accordance with FED. R.CIV.P5,LR5.5, and the General Order on Electronic Case Filing (ECF), the following documents(s):

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SECTION 404 OF THE FIRST STEP ACT**

Was served pursuant to the district court's ECF system as to ECF filing, if any, and were sent by first- class mail/ hand delivery on March 14, 2019 to counsel/ parties that are non-ECF filers.

By: s/ Amanda G. Penabad  
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